



May 15, 2025

VIA ECF

Hon. Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

Womble Bond Dickinson (US) LLP

950 Third Avenue
Suite 2400
New York, NY 10022

Joseph A. Patella
Partner
Direct Dial: 332-258-8483
Direct Fax:
E-mail: Joseph.Patella@wbd-us.com

**Re: Cimar (UK), Ltd. v. Intelrad Medical System, Inc.
Case No. 1:25-cv-02308-AS**

Dear Judge Subramanian:

Our firm represents Defendant Intelrad Medical System, Inc. (“Intelrad”) in connection with the above-referenced matter, and we respectfully submit this letter motion to file a redacted version of Intelrad’s opposition brief to Plaintiff’s Motion for Preliminary Injunctive Relief and Intelrad’s supporting declaration (together, the “Opposition”) on the public docket, and to file an unredacted version under seal, pursuant to Your Honor’s Individual Rule of Practice 11(C)(iii).

On April 7, 2025, Plaintiff Cimar (UK) Ltd. (“Cimar”) moved to file a redacted version (“Sealing Motion”) of its Motion for Preliminary Injunctive Relief and supporting declarations (together, the “PI Motion”) on the public docket, and to file an unredacted version under seal, which this Court granted (ECF Nos. 9 and 21). Consistent with Your Honor’s Individual Practice Rule 11.C.i., the parties met-and-conferred via email regarding appropriate redactions to Intelrad’s Opposition. Although Intelrad largely disagrees that the categories identified and redacted in Cimar’s Sealing Motion constitute confidential information, for purposes of the briefing for the PI Motion only, Intelrad is proposing to redact the following categories of information in its Opposition:

- All names of Cimar’s customers;
- Any mention of the status of Cimar’s software version of InteShare;
- Information concerning agreements between Cimar and their customers; and
- Any reference to a redacted portion of Cimar’s Complaint.

By redacting this information, Intelrad does not waive, and expressly reserves the right at any time in the litigation to contest the notion that any of the above-identified categories constitute confidential information.



Hon. Arun Subramanian
May 15, 2025
Page 2

Counsel for Cimar has informed us that Cimar does not object to Intelrad's requests for redactions as identified above, but that Cimar reserves its rights to seek redactions of any improperly disclosed information. In addition, Cimar has requested that Intelrad redact an additional category of information, which Intelrad objects to redacting on the ground that it concerns a statement of fact that does not require any confidentiality protection.

Accordingly, Intelrad respectfully requests that the Court grant this letter motion to publicly file a redacted version of its Opposition and an unredacted version under seal.

We thank the Court for its consideration.

Respectfully submitted,

Joseph A. Patella

cc: All Counsel of Record

The request is GRANTED. The Clerk of Court is directed to terminate the motion at Dkt. 30.

SO ORDERED.

Arun Subramanian, U.S.D.J.
Dated: May 16, 2025